

REMARKS

Claims 1-11, 13, 14 and 16-33 are pending in the application and stand rejected. Claims 1, 14, 17, 20, 23 and 27 have been amended . Applicants respectfully request reconsideration of the rejections and objections set forth in the Final Office Action in view of the above amendments and following remarks.

Specification Objection:

The Abstract was objected to for having excessive length. By the above amendment, Applicants have amended the Abstract as requested. Accordingly, withdrawal of the objection is requested.

Claim Rejections - 35 U.S.C. § 102

Claims 1-3, 8, 11-13 and 27-30 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,748,186 to Raman. At the very minimum, claims 1 and 27 are patentable over Raman because Raman does not disclose retrieving and processing a modality-independent document which is an intent-based document that describes user interaction with the application separate from application content and presentation, as essentially claimed in claims 1 and 27. Indeed, an “intent-based” document is a modality-independent document which describes the user interaction (dialog or conversation”) with the application, wherein the user interaction is separated from other aspects of the application such as content and presentation.

The Examiner relies on the modality-independent document, taught as the use of HTML documents for conversion to a common intermediate structure (Col. 3, lines 36-38) as being an “intent-based” document. Those of ordinary skill in the art readily understand that Web HTML

documents are not “modality-independent intent based” documents as claimed. Moreover, although Raman arguably discloses generating a “common intermediate representation” of an HTML document, for instance, such common representation represents that structure and content of the HTML document (see, e.g., Abstract, FIG. 2, Col. 2, lines 27-35, for example). Indeed, the “common immediate representation” includes actual content or characters and graphics of the source document (see, Col. 5, lines 7-10).

In the Response to Arguments section of the Final Office Action (page 14), Examiner relies on Raman’s teaching of “forms” as characterizing the documents as being modality-independent intent-based documents. However, such characterization and interpretation is unreasonable and unsupported in view of Applicants specification with respect to “intent-based” documents. There is simply no teaching of a modality-independent “intent-based” document in Raman.

Therefore claims 1 and 27 (and pending dependent claims) are believed to be patentably distinct and patentable over Raman. Accordingly, withdrawal of the anticipation rejections is respectfully requested.

Claim Rejections - 35 U.S.C. § 103

Claims 4-7, 9, 10, 14-26, 32 and 33 stand rejected as being unpatentable over Raman and U.S. Patent Application Publication No 2002/0032564 to Ehsani. Moreover, claim 31 stands rejected as being unpatentable over Raman and U.S. Patent 6,175,820 to Dietz. Applicants respectfully submit that at the very minimum, the combination of Raman and Ehsani and Raman and Dietz is legally deficient to establish a *prima facie* case of obviousness since such combinations do not disclose or suggest processing intent-based documents that describes user

interaction with the application separate from application content and presentation, as recited in the claims. Accordingly, withdrawal of the rejections under 35 U.S.C. 103 is respectfully requested.

Early and favorable consideration by the Examiner is respectfully urged. Should the Examiner believe that a telephone or personal interview may facilitate resolution of any remaining matters, it is requested that the Examiner contact Applicants' undersigned attorney.

Respectfully submitted,



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